

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CARMEN AUTO SALES III, INC.,
a Michigan corporation,

Case No. 16-12980
Hon. Laurie J. Michaelson
David R. Grand

Plaintiff,

v

CITY OF DETROIT, a Michigan municipal
corporation, **GENE'S TOWING**, a Michigan corporation,
B & G TOWING, a Michigan corporation, **JONATHON
D. PARNELL**, a sergeant in the Detroit Police Department,
and **JEFF BOU**, an individual working for the City of Detroit,

Defendants.

KASED LAW PLLC

By: Ziyad Kased (P72237)

ziyad@kasedlaw.com

Attorneys for Plaintiff

631 E. Big Beaver Rd, Ste. 101

Troy, MI 48083

(248) 680-7300

CITY OF DETROIT LAW DEPARTMENT

By: Eric B. Gaabo (P39213)

Gaabe@detroitmi.gov

Attorneys for Defendants City of Detroit,

Jonathan Parnell & Jeff Bou

Coleman A. Young Municipal Center

2 Woodward Avenue, 5th Floor

Detroit, MI 48226

(313) 237-3052

By: Nicholas J. Bachand (P67447)

attorneybachand@gmail.com

Attorney for Defendants B&G Towing, LLC,

And Gene's Towing, Inc.

2411 Vinewood

Detroit, MI 48216

(313) 228-0860

DEFENDANT B&G TOWING, LLC WITNESS LIST

NOW COMES Defendant, B&G TOWING, LLC, by and through its attorney,

NICHOLAS J. BACHAND, and submits the following for its Witness List:

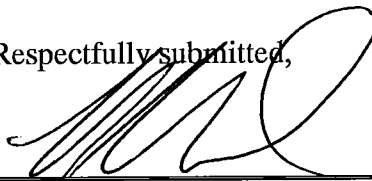
1. Current and former employees of Carmen Auto Sales III, Inc
45 E 8 Mile Road
Hazel Park, MI 48030
2. Nicholas Leo Carmisino
45 E 8 Mile Road
Hazel Park, MI 48030
3. Anthony Joseph Carmisino
45 E 8 Mile Road
Hazel Park, MI 48030
4. Jonathon D. Parnell
c/o Detroit Police Department
1301 Third St.
Detroit, MI 48226
5. Jeff Bou
c/o City of Detroit
Coleman A. Young Municipal Center
Two Woodward
Detroit, MI 48226
6. Current and former employees of the Detroit Police Department
Auction Detail Department
2121 West Fort Street
Detroit, MI 48216
7. Anthony Thomas
8100 Lynch
Detroit, MI 48234
8. Current and former employees of B&G Towing, LLC
8100 Lynch
Detroit, MI 48234
9. Paul Ott
7770 Dix
Detroit, MI 48209
10. Current and former employees of Gene's Towing, Inc.
7770 Dix
Detroit, MI 48209

11. Current and former employees of Boulevard & Trumbull Towing, Inc.
2411 Vinewood
Detroit, MI 48216
12. Accountants, Bookkeepers and Tax Return Preparers for Carmens Auto Sales III, Inc.
13. Employees, Officers, Representatives or Agents of First United Enterprises Corporation.
14. Djamel Tiguert
15. Frank Nash Carmisino
45 E 8 Mile Road
Hazel Park, MI 48030
16. Maurice Cox
City of Detroit Planning and Development Department
Coleman A. Young Municipal Center
2 Woodward Ave., Suite 412
Detroit, MI 48226
17. Jill Bryant
Detroit Building Authority
1301 Third Avenue
Detroit, MI 48226
18. Felicia Studstill
Detroit Alliance
c/o Detroit Building Authority
1301 Third Avenue
Detroit, MI 48226
19. Gwendolyn Stokes
City of Detroit Police Department
1301 Third Avenue
Detroit, MI 48226
20. David Mischiu
c/o Signature Associates
21. Jerome Eagger
Summit Commercial LLC
7700 Second Avenue, Suite 300
Detroit, MI 48202
22. Rolland Wilkins
City of Detroit

Coleman A. Young Municipal Center
2 Woodward Avenue
Detroit, MI 48226

23. Bruce Goldman
City of Detroit Law Department
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 500
Detroit, MI 48226
24. Current and former employees of the Detroit Police Department
25. Keeper of the records City of Detroit Police Department
26. Keeper of the records City of Detroit Building and Safety Engineers
27. All Necessary rebuttal witnesses.
28. All necessary impeachment witnesses.
29. All witnesses names as a result of discovery including interrogatories, depositions, requests for documents, and request for admissions.
30. Any and all witnesses listed by and on Plaintiff's and Co-Defendants witness list.
31. Defendant reserves the right to amend its Witness List up until the time of Trial as witnesses become known.

Respectfully submitted,



NICHOLAS J. BACHAND (P67447)
Attorney for Defendant B&G Towing, LLC
2411 Vinewood
Detroit, MI 48216
(313) 228-0860
attorneybachand@gmail.com

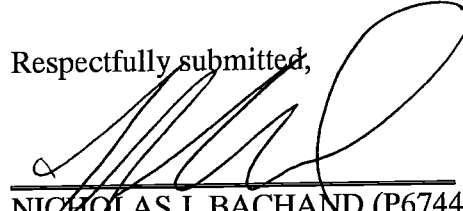
Dated: January 17, 2017

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2017 I served this Witness List of Defendant B&G Towing, LLC and this Certificate of Service, on all counsel listed on this pleading via email at the addresses listed for them.

I declare that the above statement is true to the best of my information, knowledge and belief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Nicholas J. Bachand', is written over a horizontal line.

NICHOLAS J. BACHAND (P67447)
Attorney for Defendant B&G Towing, LLC
2411 Vinewood
Detroit, MI 48216
(313) 228-0860
attorneybachand@gmail.com